

**UNITED STATES DISTRICT COURT
for the
DISTRICT OF MASSACHUSETTS**

1:05-cr-10081-MLW-ALL

UNITED STATES OF AMERICA

V.

ALEX S. NEWMAN

DEFENDANT'S PROPOSED JURY VOIR DIRE QUESTIONS

Now comes the Defendant, through counsel, and respectfully submits the following proposed questions to be submitted to the jury upon voir dire examination:

1. Would you tend to either believe or disbelieve the testimony of a law enforcement officer, such as an F.B.I. agent, simply because he or she is employed in law enforcement?
2. Do you believe that lawyers are more likely *not* to tell the truth than members of other professions?
3. Have you ever been an owner or part-owner of a business entity?
4. If your answer to the preceding question is "yes" would your experience cause you to tend to believe the testimony of a business owner over the testimony of an employee?
5. Have you ever been terminated from a position of employment for cause?
6. Do you believe that if an individual has been charged with a crime that he is probably guilty?
7. Have you ever been the victim of a theft crime?
8. Have you ever been accused of stealing from your employer?

9. Have you ever worked for an employer who was the victim of a theft crime?
10. Do you believe that people who don't pay their taxes are dishonest people?
11. Would you tend to disbelieve the testimony of a person charged with a crime who testifies in his own defense?
12. Do you believe that if a person charged with a crime does not testify in his own defense he or she must be guilty?
13. Do you feel that a person charged with a crime has to prove to you that he is not guilty in order for you to find him not guilty?

Respectfully submitted,
Alex Newman
By his attorney,

/s/ Julianne Balliro
Juliane Balliro (BBO#028010)
Wolf, Block, Schorr & Solis-Cohen
One Boston Place
Boston, MA 02108
617-226-4000

Dated: December 27, 2005

Certificate of Service

I hereby certify that, on December 27, 2005, I caused a copy of the foregoing to be filed electronically and via electronic mail to:

AUSA Robert M. Kinsella
53 Pleasant St., 4th Floor
Concord, New Hampshire 03301
robert.kinsella@usdoj.gov

/s/ Julianne Balliro
Juliane Balliro